

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE PULLMAN GROUP, LLC,

Plaintiff,

vs.

RONALD ISLEY, RUDOLPH ISLEY,  
RESERVOIR MEDIA MANAGEMENT,  
INC., THE ESTATE OF O'KELLY  
ISLEY, J.R., ISLEY BROTHERS, L.L.C.,  
ISLEY BROTHERS ROYALTY  
VENTURE I SPC, INC., THREE BOYS  
MUSIC CORPORATION, BOVINA  
MUSIC INC., T-NECK RECORDS, INC.,  
TRIPLE THREE MUSIC, INC. AND  
JOHN DOE CORPORATIONS 1-5,

Defendants.

Civil Action No. 1:20-cv-07293-GHW

Honorable Gregory H. Woods

**DECLARATION OF RHONDA H. WILLS**

I, RHONDA H. WILLS, an attorney duly admitted to practice law in the State of New York, under penalty of perjury, hereby declare:

1. I am a member in good standing of the New York state bar, and I am admitted to practice before the Southern District of New York. I am the managing attorney for Wills Law Firm, PLLC, attorney for Defendants Ronald Isley, Rudolph Isley, The Estate of O'Kelly Isley, Jr., Isley Brothers, L.L.C., Isley Brothers Royalty Venture I SPC, Inc., Three Boys Music Corporation, Bovina Music Inc., T-Neck Records, Inc., and Triple Three Music, Inc. (collectively, "Isley Defendants") in the above-captioned case.

2. I make this declaration in support of the Isley Defendants' Response in Opposition to Plaintiff The Pullman Group, LLC's Motion for Sanctions Pursuant to Fed. R. Civ. P. 26(g)(3)

and 37(c)(1) and Motion to Compel.

3. Despite the Isley Defendants' requests for Shukat's<sup>1</sup> files, the law firm is refusing to provide the documents to the Isley Defendants because there is a dispute between Shukat and the Isley Defendants regarding outstanding amounts that have been billed by the firm in legal fees.

4. While I am continuing to work in good faith with Shukat's attorney, Douglas Capuder, Esq., in an attempt to resolve the *bona fide* dispute between Shukat and the Isley Defendants regarding the contested fee bills, to date the matter has not been resolved.

5. Shukat has refused and continues to refuse to provide the firm's documents to the Isley Defendants.

6. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's Letter Motion for Conference dated March 10, 2021. [Dkt. 66].

7. Attached hereto as Exhibit 2 is a true and correct copy of this Honorable Court's Order following the pre-motion teleconference on March 17, 2021, which was entered on March 18, 2021 at 10:43 AM EDT and filed on March 18, 2021. [Dkt. 71].

8. Attached hereto as Exhibit 3 is a true and correct copy of the Isley Defendants' Amended and Second Supplemental Responses and Objections to Plaintiff The Pullman Group, LLC's First Request for the Production of Documents.

9. Attached hereto as Exhibit 4 is a true and correct copy of the letter dated March 23, 2021 from Douglas Capuder, Esq. (Shukat's Counsel) to Rhonda H. Wills, Esq. (Isley Defendants' Counsel).

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<sup>1</sup> The term "Shukat" as used herein shall mean the law firm of Shukat Arrow Hafer Weber & Herbsman LLP (now Herbsman Hafer Weber & Frisch LLP), including partners Jonas Herbsman and Michael Frisch.

10. Attached hereto as Exhibit 5 is a true and correct copy of the letter dated March 18, 2021 from Rhonda H. Wills, Esq. (Isley Defendants' Counsel) to Joshua Levin-Epstein, Esq. and Jason Mizrahi, Esq. (Plaintiff's Counsel).

11. Attached hereto as Exhibit 6 is a true and correct copy of the envelope transmitting Plaintiff's First Request for the Production of Documents to the Isley Defendants and Plaintiff's First Set of Interrogatories to the Isley Defendants, which were served on January 26, 2021 via U.S. mail.

12. Attached hereto as Exhibit 7 is a true and correct copy of the letter dated March 22, 2021 from Douglas Capuder, Esq. (Shukat's Counsel) to Joshua D. Levin-Epstein, Esq. (Plaintiff's Counsel).

13. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiff The Pullman Group, LLC's Rule 26(a) Initial Disclosures.


14. Attached hereto as Exhibit 9 is a true and correct copy of the email dated March 19, 2021 from Rhonda H. Wills, Esq. (Isley Defendants' Counsel) to Joshua Levin-Epstein, Esq. (Plaintiff's Counsel) transmitting contact information for Courtney Barnes.

15. Attached hereto as Exhibit 10 is a true and correct copy of the Isley Defendants' Second Supplemental Responses to Plaintiff's First Set of Interrogatories to the Isley Defendants.

16. Attached hereto as Exhibit 11 is a true and correct copy of the Isley Defendants' Supplemental Rule 26(a) Disclosures.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 30, 2021

  
Rhonda H. Wills